

EXHIBIT U

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2 PAGES: 1-94
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5 UNITED STATES DISTRICT COURT
6 FOR THE DISTRICT OF MINNESOTA
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9 IN RE:) No. 0:18-cv-01776-JRT-HB
10)
11 PORK ANTITRUST LITIGATION)
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12 VIDEOTAPED DEPOSITION of WANDA DURYEA
13 - CONDUCTED BY VIDEOCONFERENCE -
14 Tuesday, March 1, 2022
15 10:07 a.m. Eastern Standard Time
16
17
18
19 Michelle Keegan, RMR, CRR
20 Lexitas
21 508-478-9795 ~ 508-478.0595 (Fax)
22 www.LexitasLegal.com
23
24
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Also Present:
Jacob Figueroa, Videographer

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1 PROCEEDINGS
2 THE VIDEOGRAPHER: Good morning. We are
3 on the record on March 1st, 2022, at approximately
4 10:07 a.m. Eastern Time for the remote video
5 deposition of Wanda Duryea in the matter of In Re:
6 Pork Antitrust Litigation.
7 My name is Jacob Figueroa. I'm the
8 videographer on behalf of Lexitas.
9 Will counsel please introduce themselves
10 for the record, who they represent, beginning with
11 the party noticing this proceeding.
12 MR. KOPP: My name is Christopher Kopp.
13 I'm from the law firm Gibson, Dunn & Crutcher, and
14 I represent Smithfield.
15 MR. RISSMAN: Josh Rissman, Gustafson
16 Gleuek, for the consumer indirect purchaser
17 plaintiffs and the witness.
18 THE VIDEOGRAPHER: Will the court reporter
19 please swear in the witness.
20
21 WANDA DURYEA,
22 having been satisfactorily identified and duly
23 sworn by the Notary Public, was examined and
24 testified as follows:
25

<p style="text-align: right;">Page 33</p> <p>1 A. No.</p> <p>2 Q. Prior to 2018, had you ever listened to a</p> <p>3 Smithfield earnings report or read a Smithfield</p> <p>4 earnings report?</p> <p>5 A. No.</p> <p>6 Q. What about an earnings report by any other</p> <p>7 defendant?</p> <p>8 A. No.</p> <p>9 Q. Do you ever recall reading press releases</p> <p>10 by pork companies?</p> <p>11 A. No.</p> <p>12 Q. Can we turn to page 79, Paragraph 161.</p> <p>13 A. Okay.</p> <p>14 Q. So this is a -- you can feel free to read</p> <p>15 that paragraph.</p> <p>16 A. Okay. I read it.</p> <p>17 Q. Okay. Have you ever read that -- any of</p> <p>18 this information aside from -- did you read that</p> <p>19 information in 2010 or was the first time you read</p> <p>20 this information in connection with this case?</p> <p>21 A. In connection with this case.</p> <p>22 Q. Okay. And 162, there's some quotes here.</p> <p>23 Feel free to read Paragraph 162.</p> <p>24 A. Okay.</p> <p>25 Q. Do you recall reading this statement</p>	<p style="text-align: right;">Page 35</p> <p>1 A. The lawyers.</p> <p>2 Q. And you haven't done any independent</p> <p>3 research aside from what the attorneys have told</p> <p>4 you?</p> <p>5 A. No, I have not.</p> <p>6 Q. Let's go to page 94, Paragraph 213.</p> <p>7 MR. KOPP: Can you go up a little bit</p> <p>8 more?</p> <p>9 A. I'm sorry?</p> <p>10 Q. I'm sorry. I was talking to Jacob.</p> <p>11 MR. KOPP: 213, the paragraph.</p> <p>12 Q. So this says that at all relevant times</p> <p>13 you were a resident in Farmington, New Hampshire.</p> <p>14 I think we covered that earlier.</p> <p>15 A. Right.</p> <p>16 Q. It's accurate that you lived in Farmington</p> <p>17 except for the few months that you described in</p> <p>18 2018, 2019. Is that accurate?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And between 2008 and 2018, which</p> <p>21 defendants did you purchase pork from?</p> <p>22 A. I probably purchased from Smithfield,</p> <p>23 Hormel, Tyson, maybe Hatfield and various "I don't</p> <p>24 know" from store brand.</p> <p>25 Q. And do you know for the private label, you</p>
<p style="text-align: right;">Page 34</p> <p>1 before today?</p> <p>2 A. No, I did not.</p> <p>3 Q. Okay. Are you familiar with another case</p> <p>4 alleging that chicken companies had engaged in an</p> <p>5 antitrust conspiracy?</p> <p>6 A. I heard about it.</p> <p>7 Q. Okay. Do you remember when you heard</p> <p>8 about it?</p> <p>9 A. A few years ago. Probably about the same</p> <p>10 time that I heard about this one but didn't know</p> <p>11 that it had been going on prior to that.</p> <p>12 Q. Okay. Did you ever read a Bloomberg</p> <p>13 article about Agri Stats and the chicken industry?</p> <p>14 A. No.</p> <p>15 Q. Can you turn to page 84, Paragraph 179.</p> <p>16 Okay. Feel free to read that paragraph.</p> <p>17 A. Okay.</p> <p>18 Q. Do you know what percentage of hogs are</p> <p>19 raised on farms owned or operated by the</p> <p>20 defendants?</p> <p>21 A. I just had trouble hearing you.</p> <p>22 Q. I'm sorry. Let me ask a different</p> <p>23 question.</p> <p>24 What was the source of your information</p> <p>25 for this paragraph?</p>	<p style="text-align: right;">Page 36</p> <p>1 don't know which defendants produced the pork that</p> <p>2 you purchased?</p> <p>3 A. I do not. I asked Mr. Rissman, and he</p> <p>4 said that --</p> <p>5 MR. RISSMAN: Hold on, hold on, hold on.</p> <p>6 Stop. Don't reveal anything that we talked about.</p> <p>7 THE WITNESS: Okay.</p> <p>8 Q. Do you know if the hogs were raised on</p> <p>9 farms owned by the defendants or by third parties?</p> <p>10 MR. RISSMAN: I object to form.</p> <p>11 A. I have no way of knowing.</p> <p>12 Q. Okay. Do you know whether the price of</p> <p>13 pork in fact increased during the 2008 to 2018</p> <p>14 time period?</p> <p>15 A. I've seen it go up. Yes.</p> <p>16 Q. Okay. You've seen it go up. I know we've</p> <p>17 all seen a lot of prices go up the last year or</p> <p>18 two. Do you know prior to 2018 if prices had</p> <p>19 increased?</p> <p>20 A. Yes. I saw them going up because I buy a</p> <p>21 lot of pork.</p> <p>22 Q. Okay. Do you know if it was more or less</p> <p>23 than the rate of inflation?</p> <p>24 A. I don't.</p> <p>25 Q. Do you know if it increased more or less</p>

<p style="text-align: right;">Page 37</p> <p>1 than other types of meat?</p> <p>2 MR. RISSMAN: I object to form.</p> <p>3 A. I don't know.</p> <p>4 Q. Okay.</p> <p>5 MR. KOPP: Can we just take a five-minute</p> <p>6 break?</p> <p>7 MR. RISSMAN: Sure.</p> <p>8 THE VIDEOGRAPHER: The time is 10:49 a.m.</p> <p>9 We are going off the record.</p> <p>10 (Recess from 10:49 a.m. to 10:57 a.m.)</p> <p>11 THE VIDEOGRAPHER: The time is 10:57 a.m.</p> <p>12 We are back on the record.</p> <p>13 BY MR. KOPP:</p> <p>14 Q. And, Ms. Duryea, do you know whether</p> <p>15 between 2008 and 2018 any specific defendant cut</p> <p>16 the supply of pork?</p> <p>17 A. Do I know specifically? No.</p> <p>18 Q. Okay. Did you do any independent research</p> <p>19 into whether the defendants cut their supply of</p> <p>20 pork during that period?</p> <p>21 A. No.</p> <p>22 Q. And do you have any information, aside</p> <p>23 from what your attorney provided, about the pork</p> <p>24 supply?</p> <p>25 A. I didn't hear the last word.</p>	<p style="text-align: right;">Page 39</p> <p>1 owned by one of the defendants, or do you have any</p> <p>2 way of knowing that?</p> <p>3 A. I do not.</p> <p>4 Q. Okay. So I'd like to ask you about some</p> <p>5 of the factors that you think about when you</p> <p>6 decide where to purchase pork in terms of the</p> <p>7 actual location.</p> <p>8 A. Okay.</p> <p>9 Q. Are there -- how do you go about deciding</p> <p>10 whether or not to go to a grocery store or Walmart</p> <p>11 or any other location?</p> <p>12 A. Sometimes it may just be because I'm in</p> <p>13 the store. I look and I like that or I feel like</p> <p>14 eating it. Or other times I make a planned trip</p> <p>15 to go -- the discount stores that I go to, the</p> <p>16 big-box stores are not close to my home. Each one</p> <p>17 I go to is an hour away, so I make plans to go</p> <p>18 there.</p> <p>19 Q. And that's, like, Walmart, Sam's Club,</p> <p>20 Costco, things like that?</p> <p>21 A. Walmart is relatively close, within about</p> <p>22 a half an hour of my house. Costco is quite a</p> <p>23 ways from my home, two hours. Sam's and BJ's are</p> <p>24 within an hour.</p> <p>25 Q. Okay. Do you ever shop online? Do you</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. Oh. Do you have any information -- have</p> <p>2 you -- do you have any knowledge or information</p> <p>3 aside from what your attorney told you about the</p> <p>4 pork supply?</p> <p>5 A. No.</p> <p>6 Q. All right. So the following questions</p> <p>7 relate to the time period 2008 to 2018 and your</p> <p>8 purchases of pork. So just to start off, have you</p> <p>9 purchased pork products during that time period?</p> <p>10 A. Oh, yes.</p> <p>11 Q. What types of pork?</p> <p>12 A. Ham and bacon and sausage and pork loin,</p> <p>13 shoulder, and lots of ham.</p> <p>14 Q. Okay. Do you have any idea how much? Is</p> <p>15 there any way for you to estimate the quantity of</p> <p>16 pork that you bought over that decade-long period?</p> <p>17 A. I have no way of knowing how much, but I</p> <p>18 consistently buy a large amount of pork.</p> <p>19 Q. Okay. And I think you mentioned this</p> <p>20 earlier, but which defendants did you purchase</p> <p>21 from during that period?</p> <p>22 A. I'm sure Smithfield and Hormel, probably</p> <p>23 Tyson. And the others, I'm not sure.</p> <p>24 Q. Okay. And do you know if the pork that</p> <p>25 you purchased originated from a farm that was</p>	<p style="text-align: right;">Page 40</p> <p>1 do, like, delivery?</p> <p>2 A. For meat?</p> <p>3 Q. Yeah, for meat.</p> <p>4 A. Prior to this pandemic, I had not.</p> <p>5 Q. Have you done it since 2020 or since the</p> <p>6 pandemic started?</p> <p>7 A. Since the pandemic, I tried some meal</p> <p>8 plans.</p> <p>9 Q. So it sounds like the main criteria is</p> <p>10 just the fact of distance from your home? Sounds</p> <p>11 like that's the biggest factor affecting --</p> <p>12 A. That does determine when and where I shop.</p> <p>13 Yes.</p> <p>14 Q. Okay. So let's just focus on ham as an</p> <p>15 example. You said you bought large amounts of</p> <p>16 ham. Is that right?</p> <p>17 A. Right.</p> <p>18 Q. And how do you -- so thinking about ham,</p> <p>19 how do you choose what kind of ham you want to</p> <p>20 buy?</p> <p>21 A. So I like ham for breakfast. And almost</p> <p>22 every day I eat ham and Swiss for breakfast, and I</p> <p>23 have generally had ham at Thanksgiving.</p> <p>24 Q. Do you eat prepackaged ham or is it deli</p> <p>25 ham?</p>

<p style="text-align: right;">Page 57</p> <p>1 Q. You do not buy -- okay.</p> <p>2 Do you know how Walmart sets its prices?</p> <p>3 A. I do not.</p> <p>4 Q. BJ's and Market Basket, do you know the</p> <p>5 wholesale price that they pay?</p> <p>6 A. No.</p> <p>7 Q. Do you ever shop at farmer's markets?</p> <p>8 A. No.</p> <p>9 Q. What about -- I think you mentioned some</p> <p>10 wholesale clubs like Costcos or Sam's Club. Do</p> <p>11 you shop at either of those or any other wholesale</p> <p>12 clubs?</p> <p>13 A. Costco is too far away from me in</p> <p>14 New Hampshire. It's about two hours. Sam's Club,</p> <p>15 I do go to.</p> <p>16 Q. Okay. How far away is Sam's Club?</p> <p>17 A. About an hour and 15 minutes.</p> <p>18 Q. And like how often would you purchase pork</p> <p>19 from Sam's Club?</p> <p>20 A. Maybe once every two or three months.</p> <p>21 Q. Do you know how Sam's Club sets its</p> <p>22 prices?</p> <p>23 A. I do not.</p> <p>24 Q. And I assume you don't know the wholesale</p> <p>25 price that they pay or the markup?</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. Okay. I think earlier you mentioned some</p> <p>2 delivery services. What delivery services do you</p> <p>3 use?</p> <p>4 MR. RISSMAN: Are you talking about --</p> <p>5 A. Nobody because they --</p> <p>6 MR. RISSMAN: Sorry. Hold on. Are you</p> <p>7 talking about the relevant period or not?</p> <p>8 MR. KOPP: Okay. Let me reframe it.</p> <p>9 Q. Earlier you said -- when did you start</p> <p>10 using delivery services?</p> <p>11 A. I don't use delivery services.</p> <p>12 Q. Okay. So from 2008 to 2018, is it fair to</p> <p>13 say you did all your shopping in person?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. All right. Let's go to Tab 6.</p> <p>16 Okay. Feel free to scroll through this,</p> <p>17 and let me know when you're ready for me to ask</p> <p>18 you a few questions.</p> <p>19 A. What you're showing is not what I have</p> <p>20 under Tab 6.</p> <p>21 Q. What do you have under Tab 6?</p> <p>22 A. I have "Exhibit A - ROG 5-6."</p> <p>23 Q. Is there a 6A? They might have gotten it</p> <p>24 backwards when they mailed it.</p> <p>25 Can you look in your binder and --</p>
<p style="text-align: right;">Page 58</p> <p>1 A. No, I do not.</p> <p>2 Q. Do you ever buy pork from convenience</p> <p>3 stores?</p> <p>4 A. No.</p> <p>5 Q. Specialty shops?</p> <p>6 A. No.</p> <p>7 Q. Dollar stores?</p> <p>8 A. No.</p> <p>9 Q. Do you ever purchase pork from</p> <p>10 restaurants?</p> <p>11 A. When I go out to eat, yes.</p> <p>12 Q. Are you seeking damages for -- from</p> <p>13 restaurants?</p> <p>14 MR. RISSMAN: Objection, calls for a legal</p> <p>15 conclusion.</p> <p>16 A. Not that I'm aware of.</p> <p>17 MR. RISSMAN: Hold on, let me object.</p> <p>18 Objection, calls for a legal conclusion.</p> <p>19 Q. I think you can answer again. I don't</p> <p>20 know if --</p> <p>21 A. I said, "Not that I'm aware of."</p> <p>22 Q. Okay. Are there any other places that you</p> <p>23 purchase pork from that we have not discussed?</p> <p>24 MR. RISSMAN: I object to form.</p> <p>25 A. Not that I'm aware of.</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Wait a minute. Several pages in. Okay.</p> <p>2 I see this.</p> <p>3 Q. Have you ever seen this document before?</p> <p>4 A. No.</p> <p>5 Q. So prior to seeing this document today,</p> <p>6 were you aware that the defendants had asked you</p> <p>7 to provide answers to interrogatories?</p> <p>8 A. Yes.</p> <p>9 MR. RISSMAN: Objection to form.</p> <p>10 Q. Okay. Did you have any input on your</p> <p>11 response or on the plaintiffs' response to the</p> <p>12 defendants' interrogatories?</p> <p>13 A. Yes. I answered all of the questions.</p> <p>14 Q. Did you review a draft of the objections</p> <p>15 to defendants' interrogatories?</p> <p>16 MR. RISSMAN: Objection.</p> <p>17 A. Yes.</p> <p>18 MR. RISSMAN: Hold on, Wanda.</p> <p>19 Objection. Calls for attorney-client</p> <p>20 privilege.</p> <p>21 She already answered, so I'll have to let</p> <p>22 that one go.</p> <p>23 Wanda, make sure you pause and give me a</p> <p>24 chance to --</p> <p>25 THE WITNESS: All right. I'm sorry.</p>

<p style="text-align: right;">Page 61</p> <p>1 MR. RISSMAN: That's okay.</p> <p>2 Q. I think we can turn to Exhibit A.</p> <p>3 A. In this section or all the way back?</p> <p>4 Q. I believe it's Tab 6A. It's this kind of</p> <p>5 like a spreadsheet.</p> <p>6 A. Oh, so that's -- they did it backwards.</p> <p>7 Okay. Gotcha. Okay.</p> <p>8 Q. All right. And if you go down to Row 42.</p> <p>9 A. Okay.</p> <p>10 Q. So there are five stores next to your</p> <p>11 name. And I think we've discussed all of these</p> <p>12 stores: Walmart, Sam's Club, BJ's, Costco, Market</p> <p>13 Basket?</p> <p>14 A. Yes.</p> <p>15 Q. Are there any other stores that you</p> <p>16 purchased from that you are seeking damages with</p> <p>17 respect to?</p> <p>18 MR. RISSMAN: I object to form and calls</p> <p>19 for a legal conclusion.</p> <p>20 A. Not that I'm aware of.</p> <p>21 Q. Okay. Are there other products that you</p> <p>22 are seeking damages on aside from the products</p> <p>23 listed in Column C?</p> <p>24 MR. RISSMAN: Same objection.</p> <p>25 A. Not from me, that I'm aware of.</p>	<p style="text-align: right;">Page 63</p> <p>1 "hog processor" means?</p> <p>2 MR. RISSMAN: Objection.</p> <p>3 A. That would probably be the butcher.</p> <p>4 Q. So if we go back down to Row 42, I see</p> <p>5 that these are empty. Is it fair to say you don't</p> <p>6 know who the farmer or hog producer is or who the</p> <p>7 hog processor is for the specific cuts of meat?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. So I'm going to shift gears a</p> <p>10 little bit. I know earlier we discussed you lived</p> <p>11 in New Hampshire.</p> <p>12 So between 2008 and 2018, aside from the</p> <p>13 time that you mentioned spending a month here, a</p> <p>14 month there in New York, were there other times</p> <p>15 that you left the state for more than, say, a week</p> <p>16 at a time?</p> <p>17 A. No.</p> <p>18 Q. I'm sure you recall that there was an</p> <p>19 economic calamity in 2008 and 2009. Correct?</p> <p>20 A. Yeah.</p> <p>21 Q. Did the financial crisis affect you</p> <p>22 personally?</p> <p>23 A. I lost my job.</p> <p>24 Q. Okay.</p> <p>25 MR. RISSMAN: Chris, do you want to take</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. On the -- in Column G, it lists four</p> <p>2 brands. Is that right?</p> <p>3 A. Yes.</p> <p>4 Q. Why would you buy branded versus store</p> <p>5 label and vice versa?</p> <p>6 MR. RISSMAN: Objection to form.</p> <p>7 A. Sometimes there isn't what I want by the</p> <p>8 brand.</p> <p>9 Q. So mostly availability?</p> <p>10 A. Right.</p> <p>11 Q. Is there a pricing difference?</p> <p>12 A. The thing that I mostly buy that is not</p> <p>13 branded is sausage. And I don't see any branded</p> <p>14 sausage when I buy this.</p> <p>15 Q. Okay. And do you know if the sausage is</p> <p>16 processed by one of the defendants?</p> <p>17 A. I do not.</p> <p>18 Q. Okay. Can we go up to the top of this</p> <p>19 exhibit? So in H, Column H says "hog producer."</p> <p>20 Do you have an understanding of what the</p> <p>21 "hog producer" means?</p> <p>22 A. I would think that they would be the</p> <p>23 farmer that takes care of them.</p> <p>24 Q. Okay. And looking at Column I, "hog</p> <p>25 processor," do you have an understanding of what</p>	<p style="text-align: right;">Page 64</p> <p>1 down the Tab 6A?</p> <p>2 MR. KOPP: Oh, yeah. Sure.</p> <p>3 Can we please Mark Tab 6 and Tab 6A as</p> <p>4 exhibits.</p> <p>5 (Exhibits 6 and 6A marked for</p> <p>6 identification)</p> <p>7 MR. RISSMAN: Sorry to interrupt.</p> <p>8 MR. KOPP: No problem.</p> <p>9 Q. So you lost your job in 2008, 2009. How</p> <p>10 did that affect your purchasing decisions?</p> <p>11 MR. RISSMAN: I object to form.</p> <p>12 A. I don't remember that it changed anything</p> <p>13 that I would buy or wouldn't.</p> <p>14 Q. Okay. Did it make you more conscious of</p> <p>15 prices or anything else when shopping?</p> <p>16 MR. RISSMAN: Objection.</p> <p>17 A. I believe I --</p> <p>18 THE WITNESS: I'm sorry.</p> <p>19 MR. RISSMAN: Go ahead.</p> <p>20 A. I believe I'm always conscious of the</p> <p>21 price I'm paying.</p> <p>22 Q. Did you buy less meat during that period?</p> <p>23 A. No.</p> <p>24 Q. Did you buy -- did you buy any less pork?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 65</p> <p>1 Q. Have you ever heard of something called</p> <p>2 the Porcine Epidemic Diarrhea Virus, something</p> <p>3 called PEDV?</p> <p>4 A. No.</p> <p>5 Q. Do you recall the swine flu epidemic?</p> <p>6 A. Yes.</p> <p>7 Q. Did the swine flu affect your choice to</p> <p>8 eat swine or pork?</p> <p>9 A. No.</p> <p>10 Q. Do you recall reading anything about how</p> <p>11 it impacted the pork supply nationally?</p> <p>12 MR. RISSMAN: Objection.</p> <p>13 A. I don't think I read anything.</p> <p>14 Q. What about do you recall anything</p> <p>15 regarding how the swine flu affected pork demand?</p> <p>16 MR. RISSMAN: I object to form.</p> <p>17 A. No.</p> <p>18 Q. Have you been harmed by the conspiracy</p> <p>19 that you allege in this case?</p> <p>20 A. I believe so.</p> <p>21 Q. And how have you been harmed?</p> <p>22 A. I believe I paid more for pork products</p> <p>23 than I should have.</p> <p>24 Q. Okay. And do you have any idea how much</p> <p>25 more you've had to pay than you should have?</p>	<p style="text-align: right;">Page 67</p> <p>1 A. There is a settlement with Hagens Berman,</p> <p>2 not directly with me.</p> <p>3 Q. Okay. And which defendant is that?</p> <p>4 A. I believe it's JBS.</p> <p>5 Q. Okay. Can you tell me roughly how much</p> <p>6 money you spent on pork product purchases between</p> <p>7 2008 and 2018?</p> <p>8 MR. RISSMAN: I object to form.</p> <p>9 A. I have no way to tell you. If I had</p> <p>10 receipts, I would have given them to you.</p> <p>11 Q. Okay. So earlier I think you said Market</p> <p>12 Basket has really good pricing?</p> <p>13 A. Yes.</p> <p>14 Q. Do you think you were overcharged when you</p> <p>15 bought pork at Market Basket?</p> <p>16 A. Yes.</p> <p>17 Q. What about at Walmart? Do you think</p> <p>18 Walmart overcharged you for pork that was</p> <p>19 purchased there?</p> <p>20 MR. RISSMAN: Object to the form.</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And how much -- do you have any way</p> <p>23 of knowing how much you were overcharged?</p> <p>24 MR. RISSMAN: Objection, calls for expert</p> <p>25 testimony.</p>
<p style="text-align: right;">Page 66</p> <p>1 MR. RISSMAN: Objection, calls for expert</p> <p>2 testimony.</p> <p>3 A. I'm going to rely on the experts that the</p> <p>4 lawyers retained.</p> <p>5 Q. Do you know which companies are</p> <p>6 responsible for the harm that you suffered?</p> <p>7 MR. RISSMAN: I object to form.</p> <p>8 A. It seems as though everyone that I've</p> <p>9 bought pork from.</p> <p>10 Q. Okay. Has Smithfield harmed you?</p> <p>11 A. I believe so.</p> <p>12 Q. And how has Smithfield harmed you?</p> <p>13 A. By charging me more than what I would have</p> <p>14 paid in a free market system.</p> <p>15 Q. How have the other defendants harmed you?</p> <p>16 A. In the same way.</p> <p>17 Q. And how did you learn that you've -- how</p> <p>18 did you learn that you've been harmed?</p> <p>19 A. By speaking with Hagens Berman.</p> <p>20 Q. Do you have any information, aside from</p> <p>21 what you've received from Hagens Berman, about the</p> <p>22 harm that you've suffered?</p> <p>23 A. No.</p> <p>24 Q. Have any defendants in this case settled</p> <p>25 with you?</p>	<p style="text-align: right;">Page 68</p> <p>1 A. No.</p> <p>2 Q. Okay. Aside from what you've learned from</p> <p>3 your attorneys or the information provided to you</p> <p>4 from your attorneys, do you have any way of</p> <p>5 calculating the amount that you've been</p> <p>6 overcharged from any of these retailers?</p> <p>7 A. No.</p> <p>8 Q. Did you ever purchase pork directly from</p> <p>9 any of the producers, like Tyson or Smithfield?</p> <p>10 A. No.</p> <p>11 Q. Is it your theory or is it your</p> <p>12 understanding that grocery stores were overcharged</p> <p>13 by the -- by Smithfield and Tysons?</p> <p>14 MR. RISSMAN: I object to form.</p> <p>15 A. It's my opinion that they were overcharged</p> <p>16 and they then marked that up and I was</p> <p>17 overcharged.</p> <p>18 Q. But am I correct, you know, we don't --</p> <p>19 you don't have any information, aside from what</p> <p>20 you've been provided from your attorneys, about,</p> <p>21 you know, the -- you don't have any information</p> <p>22 about the wholesale prices, the markup that the</p> <p>23 whole -- that the retailers are charged by the</p> <p>24 wholesalers. Is that correct?</p> <p>25 MR. RISSMAN: I object to form.</p>